

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
(Rural Development)  
Plaintiff

v.

MARITZA SANCHEZ-GONZALEZ  
Defendant

CIVIL NO. 97-2150 (DRD)

FORECLOSURE OF MORTGAGE

**MOTION FOR WITHDRAWAL OF FUNDS**

TO THE HONORABLE COURT:

COMES NOW Plaintiff, United States of America, by its undersigned attorneys and alleges and requests:

1. That on September 9, 2004, the mortgaged real property at Urb. Extensión Medina No. A-5, Barrio Mora, Isabela, Puerto Rico, was sold at public auction by the Plaintiff of the above mentioned proceedings to Arquelio Acosta, for \$50,800.00.

2. Said property is fully described in the Complaint filed by the Plaintiff in this action.

3. The legal fees incurred by Rural Development and the U.S. Attorney's Office in this case is the amount of \$767.39.

4. That as of the date of the sale, the balance owed to Plaintiff is in the principal sum of 41,241.65, plus interest in the sum of \$35,185.88, plus subsidy recapture in the sum of \$12,052.00 for a total balance of \$88,479.53. The statement of account of September 9, 2004, that is herein attached as **Exhibit A**, excludes the legal fees of \$767.39, which added, increases the total balance owed to \$89,246.92.

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5. Since the auctioned property was sold for \$50,800.00, that is less than the amount owed to Rural Development, which is the amount of \$89,245.92, there is a deficiency judgment.

6. The total fees for effecting said sale total \$1,448.10, amount retained by the United States Marshal Service, leaving a balance of \$49,351.90, to be disbursed to the United States Department of Justice.

WHEREFORE, it is respectfully requested from this Honorable Court to order the issuance of a check for \$49,315.90 payable to the U.S. Department of Justice.

In San Juan, Puerto Rico, this 5<sup>th</sup> day of May, 2005.

H.S. GARCIA  
United States Attorney

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